

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

Michael Daniel Remington
Debtor

PNC Bank, National Association
Movant

V.

Michael Daniel Remington
Respondent

Charles J. Dehart, III
Trustee/Respondent

Chapter 13

1:19-bk-05208-HWV

Answer

ANSWER

AND NOW, this 27th day of April 2020, the Debtor, Michael Daniel Remington, by and through counsel, Dawn M. Cutaia, files this Answer to the Motion for Relief from Stay filed by PNC Bank, National Association :

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. By way of further answer, Debtor has tested positive for Covid19 (and provided proof of that diagnosis to Counsel). Debtor cannot list the property while he is recovering but he has obtained a Realtor and he does intend to move forward with listing the property for sale. Debtor believes there is significant equity in the property. Furthermore, Counsel for Movant and Counsel for Debtor have agreed that under the circumstances it would be best to continue the hearing 30 days, to allow Debtor an opportunity to recover and get the house listed.
9. No response is required.

WHEREFORE, the Debtor respectfully requests this Honorable Court deny the Motion for Relief.

Date: 04/27/2020

Respectfully Submitted,

By: **/s/ Dawn M. Cutaia**
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